

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 24-cv-80395-RLR

DR. JEFF ISAACS,

Plaintiff,

vs.

GOOGLE, LLC,

Defendant.

/

**DEFENDANT GOOGLE, LLC'S MOTION
FOR EXTENSION OF TIME TO FILE A JOINT SCHEDULING REPORT**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rule 7.1(a)(1)(J), Defendant Google, LLC (“Google”) respectfully requests the entry of an order extending the parties’ deadline for filing a joint scheduling report up though and including August 27, 2024, and in support thereof Google states as follows:

1. Pro se plaintiff Dr. Jeff Isaacs (“Isaacs”) commenced this action on April 1, 2024, with the filing of his Complaint against Google. D.E. 1.
2. On July 30, 2024, Google responded to the Complaint by moving to dismiss for lack of standing and failure to state a claim. D.E. 16.
3. Pursuant to the Court’s April 11, 2024 Order (D.E. 6), Google and Isaacs engaged in lengthy conferrals and all but agreed to a proposed scheduling report that would be due today, August 13, 2024.
4. However, at 9:49 p.m. today, Isaacs amended the complaint and added a new party, Greenflight Venture Corporation, which appeared with new counsel that had not participated in any conferrals with Isaacs or Google on the joint scheduling report.

5. In light of this change and the appearance of a new party and new counsel, Google respectfully requests a two-week enlargement of time to finalize and file the parties' joint scheduling report.

6. This motion is made in good faith and not for the purposes of delay. The brief extension requested will not prejudice any party.

WHEREFORE, Google respectfully requests that the Court enlarge the time for the parties to file a joint scheduling report up through and including August 27, 2024.

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3), undersigned counsel certifies that she conferred with the parties regarding the requested relief and that Isaacs responded that he has no objection, but no response was received from newly appearing party Greenflight.

Dated: August 13, 2024

Respectfully submitted,

By: /s/ Ana M. Barton
Ana M. Barton
Fla. Bar No. 85721
abarton@reedsmit.com
REED SMITH LLP
200 S. Biscayne Blvd., Floor 26
Miami, FL 33131
Telephone: (786) 747-0200
Counsel for Google, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been electronically filed with the Clerk of Court and served via transmission of Notice of Electronic Filing generated by CM/ECF on all counsel or parties of record, on this 13th day of August, 2024.

By: */s/ Ana M. Barton*
Ana M. Barton